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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

RENO MAY, ET AL.;

Plaintiffs.

V.

**ROB BONTA, IN HIS OFFICIAL
CAPACITY AS ATTORNEY GENERAL
OF CALIFORNIA,**

Defendant.

Case No. 8:23-cv-01696-MRA-ADS

**SECOND STIPULATION TO EXTEND
DEFENDANT'S TIME TO RESPOND
TO COMPLAINT**

Courtroom: 10B

Judge: Hon. Mónica Ramírez Almadani

Action Filed: September 26, 2023

1 Plaintiffs Reno May, Anthony Miranda, Eric Hans, Gary Brennan, Tony
2 Barretto, Isabelle R. Barretto, Barry Bahrami, Pete Stephenson, Jose Flores,
3 Andrew Harms, Dr. Sheldon Hough, DDS, The Second Amendment Foundation,
4 Gun Owners of America, Gun Owners Foundation, Gun Owners of California, Inc.,
5 the Liberal Gun Club, Inc., and the California Rifle & Pistol Association,
6 Incorporated (collectively, Plaintiffs) and Defendant Rob Bonta in his official
7 capacity as Attorney General of California (Defendant, and together with Plaintiffs,
8 the Parties) hereby stipulate and agree as follows:

9 **WHEREAS**, on September 12, 2023, Plaintiffs filed their Complaint (Dkt. 1)
10 in this matter;

11 **WHEREAS**, on September 29, 2023, Plaintiffs filed their Motion for
12 Preliminary Injunction (Dkt. 13);

13 **WHEREAS**, on October 11, 2023, the Court entered the Parties' stipulation to
14 extend Defendant's time to answer or otherwise respond to the Complaint until 21
15 days after the Court ruled on Plaintiffs' Motion for Preliminary Injunction (Dkt.
16 19);

17 **WHEREAS**, on December 20, 2023, the Court issued its Order and
18 Preliminary Injunction (Dkts. 45-46);

19 **WHEREAS**, on December 22, 2023, Defendant filed its notice of appeal
20 appealing the Order and Preliminary Injunction (Dkt. 48);

21 **WHEREAS**, the Court entered the Parties' stipulation to extend Defendant's
22 time to answer or otherwise respond to the Complaint until 21 days after the Ninth
23 Circuit's resolution of Defendant's appeal of the Court's Order and Preliminary
24 Injunction (Dkt. 51);

25 **WHEREAS**, on January 23, 2025, the Ninth Circuit issued its mandate in
26 Defendant's appeal of the Court's Order and Preliminary, and thus Defendant's
27 deadline to respond to the Complaint is now February 13, 2025 (Dkt. 61);

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1 **WHEREAS**, good cause exists for this extension because (a) this case
2 presents a constitutional challenge to numerous provisions of California Penal Code
3 26230(a), and (b) lead counsel for Defendant, Robert L. Meyerhoff, recently
4 returned from parental leave on January 24, 2025;

5 **WHEREAS**, the Parties agree to extend Defendant's deadline to answer or
6 otherwise respond to the Complaint to March 13, 2025, and, should Plaintiff file an
7 Amended Complaint, the Parties agree to extend Defendant's deadline to respond to
8 that Amended Complaint March 13, 2025, or 21 days after the filing of the
9 Amended Complaint, whichever is later;

10 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the
11 Parties that, with the Court's permission:

- 12 • Defendant's deadline to answer or otherwise respond to the Complaint is
13 extended until March 13, 2025, and, should Plaintiff file an Amended
14 Complaint, Defendant's deadline to respond to that Amended Complaint is
15 extended until March 13, 2025, or 21 days after the filing of the Amended
16 Complaint, whichever is later.

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1 Dated: January 30, 2025

Respectfully submitted,

2 ROB BONTA
3 Attorney General of California
4 MARK R. BECKINGTON
5 Supervising Deputy Attorney General

6 /s/ Robert L. Meyerhoff
7 ROBERT L. MEYERHOFF
8 Deputy Attorney General

9 *Attorneys for Rob Bonta in his official
10 capacity as Attorney General for the
11 State of California*

12 Dated: January 30, 2025

13 Respectfully submitted,

14 /s/ Konstadinos T. Moros
15 C.D. MICHEL
16 JOSHUA ROBERT DALE
17 ALEXANDER A. FRANK
18 KONSTADINOS T. MOROS

19 Michel & Associates, P.C.

20 *Attorneys for Plaintiffs Lance Boland,
21 Mario Santellan, Reno May, Jerome
22 Schammel, and the California Rifle &
23 Pistol Association, Incorporated*

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